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Attorneys for Plaintiff
CHRIS PRINCIPE

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

CHRIS PRINCIPE.

Plaintiff,

V.

TIMOTHY GLEN CURRY A/K/A
TIMOTHY TAYSHUN,

Defendant.

) Case No. 8:17-cv-00608 JLS (KESx)

**FIRST STIPULATION TO EXTEND
DEADLINE TO FILE DISMISSAL
WITH PREJUDICE**

1 Plaintiff Chris Principe and Defendant Timothy Glen Curry, by and through their
2 respective counsel, stipulate to extend the deadline for the parties to file a dismissal with
3 prejudice by 30 days from May 7, 2018 to June 6, 2018. This stipulation is based on the
4 following facts:

5 1. On March 30, 2018, the parties engaged in a mediation in an attempt to
6 resolve this dispute. The parties reached a settlement in principal and filed a notice of
7 settlement shortly thereafter.

8 2. On April 9, 2018, in response to the parties' notice of settlement, the Court
9 issued an Order Staying the Action Pending Final Settlement, Removing Case from
10 Active Caseload, and Filing of Dismissal, Dkt. 48 (the "Order"). The Order provides the
11 parties until May 7, 2018 to file a stipulation to dismiss the case. The Order further stated
12 that if a stipulation was not filed by that date, the action would be dismissed.

13 3. The parties have worked together to draft a long-form settlement agreement
14 memorializing the terms of their settlement in principal. Significant progress has been
15 made, and a draft has been circulated among the parties.

16 4. The parties, however, believe that they require an additional 30 days to
17 finalize the terms of this written agreement. The parties expect that the remaining terms
18 can be finalized within 30 days.

19 5. This is the first request for an extension of the May 7, 2018 deadline, and the
20 parties request this extension for the above reasons and not for the purpose of delay.

21 Based on the foregoing, the parties respectfully request that the Court enter an
22 order granting this stipulation and allowing the parties until June 6, 2018 to file a
23 stipulation to dismiss with prejudice.

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SO STIPULATED:

DATED: April 30, 2018

Tucker Ellis LLP

By: /s/Steven E. Lauridsen

Howard A. Kroll

Steven E. Lauridsen

Attorneys for Plaintiff

CHRIS PRINCIPE

DATED: April 30, 2018

Law Office of Daniel A. De Soto

By: /s/Daniel A. DeSoto*

Daniel A. De Soto

Attorneys for Defendant

TIMOTHY GLEN CURRY

*Pursuant to Local Rule 5-4.3.4(a)(2), the filing party attests that Defendant's counsel concurs in the content of this stipulation and has authorized its filing with his electronic signature.